

CAPITAL BENCHMARK PARTNERS

Form ADV Part 2A – Firm Brochure

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Item 1: Cover Page

This Brochure provides information about the qualifications and business practices of Capital Benchmark Partners, LLC, (“CBP”). If you have any questions about the contents of this Brochure, please contact us at (770) 217-1202 and/or hello@capitalbenchmarkpartners.com. The information in this Brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Capital Benchmark Partners, LLC is registered as an Investment Adviser with the State of Georgia. Registration of an Investment Adviser does not imply any level of skill or training.

Additional information about Capital Benchmark Partners is available on the SEC’s website at <https://www.adviserinfo.sec.gov>, which can be found using the firm’s identification number (CRD #) 175099.

Item 2: Material Changes

The purpose of this section is to inform you of any material changes since the last annual update to this brochure. If you are receiving this brochure for the first time, this section may not be relevant to you.

CBP reviews and updates our brochure at least annually to make sure that it remains current.

The following changes have been made since our last annual update on March 4, 2022.

- We have added information regarding risks related to geopolitical and catastrophic events. See Item 8 for additional details.
- In consideration of the acquisition of TD Ameritrade, Inc. (“TD Ameritrade”) by Charles Schwab & Co., Inc. (“Schwab”), and the intended transition to Schwab as custodian in 2023, we have updated Item 12 and Item 14 to include references to Schwab as custodian.
- Item 5 has been updated to reflect that the fee information shown is as of the date of this Brochure. Legacy clients may have different fee schedules. In addition, CBP reserves the right to waive or discount fees at its discretion. The Client’s actual fee will be as set forth in the advisory agreement between CBP and the Client.

Future Changes

From time to time, we may amend this Disclosure Brochure to reflect changes in our business practices, changes in regulations and routine annual updates as required by the securities regulators. This complete Disclosure Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Capital Benchmark Partners, LLC.

At any time, you may view the current Disclosure Brochure online at the SEC’s Investment Adviser Public Disclosure website at <https://www.adviserinfo.sec.gov> by searching for our firm name or by our CRD number 175099.

You may also request a copy of this Disclosure Brochure at any time, by contacting us at (770) 217-1202 and/or hello@capitalbenchmarkpartners.com.

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Item 4: Advisory Business

Description of Advisory Firm

Capital Benchmark Partners, LLC (“CBP”) is a limited liability company formed January 2014 in the State of Georgia. It is registered as an Investment Adviser with the State of Georgia. Hao “Helen” Ngo is the principal owner of the firm. As of December 31, 2022, CBP had approximately \$19,100,000 in assets under management on a discretionary basis. In addition, CBP also provides non-discretionary advice on approximately \$1,100,000 in qualified retirement plan accounts.

This brochure provides Clients with information regarding CBP and the qualifications, business practices, and nature of advisory services that should be considered before becoming an advisory Client of CBP.

Prior to engaging CBP to provide services, Clients are required to enter into an agreement with CBP setting the terms and conditions of the engagement (including termination), describing the scope of the services to be provided, and the portion of the fee that is due from the Client prior to CBP beginning services. It remains the Client’s responsibility to promptly notify CBP if there is ever any change in the Client’s financial situation or investment objectives for the purpose of reviewing/evaluating/revising CBP’s previous recommendations and/or services.

Types of Advisory Services

Investment Management Services

CBP is in the business of managing individually tailored investment portfolios. Our firm provides continuous advice to a Client regarding the investment of Client funds based on the individual needs of the Client. Through personal discussions in which goals and objectives based on a Client's particular circumstances are established, we develop a Client's personal investment policy or an investment plan with an asset allocation target and create and manage a portfolio based on that policy and allocation target. During our data-gathering process, we determine the Client’s individual objectives, time horizons, risk tolerance, and liquidity needs. We may also review and discuss a Client’s prior investment history, as well as family composition and background.

Investment planning may involve developing an asset allocation strategy to meet Clients’ financial goals and risk tolerance, providing information on investment vehicles and strategies, and reviewing employee stock options.

We may assist you in establishing your own investment or retirement accounts at a selected broker/dealer or custodian.

The strategies and types of investments we may recommend are further discussed in Item 8 of this brochure.

Account supervision is guided by the stated objectives of the Client (i.e., maximum capital appreciation, growth, income, or growth and income), as well as tax considerations. Clients may impose reasonable restrictions on investing in certain securities, types of securities, or industry sectors.

Fees pertaining to this service are outlined in Item 5 of this brochure.

Comprehensive Financial Planning

CBP provides comprehensive financial planning services on topics such as retirement planning, risk management, college savings, cash flow, debt management, work benefits, and estate and incapacity planning.

This service involves working one-on-one with a planner over an extended period of time. By paying an hourly rate for consultation or a monthly fee, Clients get to work with a planner who will work with them to develop and implement their plan. The planner will monitor the plan, recommend any changes and ensure the plan is up to date.

Financial planning is a comprehensive evaluation of a Client’s current and future financial state by using currently known variables to predict future cash flows, asset values and withdrawal plans. The key defining aspect of financial planning is that through the financial planning process, all questions, information and analysis will be considered as they impact and are impacted by the entire financial and life situation of the Client. Clients purchasing this service will receive a written or an electronic report, providing the Client with a detailed financial plan designed to achieve his or her stated financial goals and objectives.

Upon desiring a comprehensive plan, a Client will be taken through establishing their goals and values around money. They will be required to provide information to help complete the following areas of analysis: net worth, cash flow, insurance, credit scores/reports, employee benefits, retirement planning, investments, college planning and estate planning. Once the Client's information is reviewed, their plan will be built and analyzed, and then the findings, analysis and potential changes to their current situation will be reviewed with the Client. If a follow-up meeting is required, we will meet at the Client's convenience. The plan and the Client's financial situation and goals will be monitored throughout the year and follow-up phone calls and emails will be made to the Client to confirm that any agreed upon action steps have been carried out. On an annual basis, there will be a full review of this plan to ensure its accuracy and ongoing appropriateness. Any needed updates will be implemented at that time.

In general, the financial plan will address any or all of the following areas of concern. The Client and advisor will work together to select the specific areas to cover. These areas may include, but are not limited to, the following:

- **Business Planning:** We provide consulting services for Clients who currently operate their own business, are considering starting a business, or are planning for an exit from their current business. Under this type of engagement, we work with you to assess your current situation, identify your objectives, and develop a plan aimed at achieving your goals.
- **Debt Management:** Advice may also be provided on which debts to pay off first based on factors such as the interest rate of the debt and any income tax ramifications.
- **Cash Flow Management:** We will conduct a review of your income and expenses to determine your current surplus or deficit along with advice on prioritizing how any surplus should be used or how to reduce expenses if they exceed your income. We may also recommend what we believe to be an appropriate cash reserve that should be considered for emergencies and other financial goals, along with a review of accounts (such as money market funds) for such reserves, plus strategies to save desired amounts.
- **Child Expense Planning & College Savings:** Includes projecting the amount that will be needed to achieve college or other post-secondary education funding goals, along with advice on ways for you to save the desired amount. Recommendations as to savings strategies are included, and, if needed, we will review your financial picture as it relates to eligibility for financial aid or the best way to contribute for children and/or grandchildren (if appropriate).
- **Employee Benefits Optimization:** We will provide review and analysis as to whether you, as an employee, are taking the maximum advantage possible of your employee benefits. If you are a business owner, we will consider and/or recommend the various benefit programs that can be structured to meet both business and personal retirement goals.
- **Estate Planning:** This usually includes an analysis of your exposure to estate taxes and your current estate plan, which may include whether you have a will, powers of attorney, trusts and other related documents. Our advice also typically includes ways for you to minimize or avoid future estate taxes by implementing appropriate estate planning strategies such as the use of applicable trusts.

We always recommend that you consult with a qualified attorney when you initiate, update, or complete estate planning activities. We may provide you with contact information for attorneys who specialize in estate planning when you wish to hire an attorney for such purposes. From time-to-time, we will participate in meetings or phone calls between you and your attorney with your approval or request.

- **Financial Goals:** We will help Clients identify financial goals and develop a plan to reach them. We will identify what you plan to accomplish, what resources you will need to make it happen, how much time you will need to reach the goal, and how much you should budget for your goal.
- **Insurance Analysis:** Review of existing policies to ensure proper coverage for life, health, disability, and long-term care.
- **Investment Analysis:** This involves reviewing Clients' portfolios and analyzing the performance of such accounts holding investment vehicles. It may also involve reviewing Clients' risk tolerance, time horizon, funds availability, and financial goals to make adjustments to the asset allocation of their portfolios.

- **Retirement Planning:** Our retirement planning services typically include projections of your likelihood of achieving your financial goals, typically focusing on financial independence as the primary objective. For situations where projections show less than the desired results, we may make recommendations, including those that may impact the original projections by adjusting certain variables (i.e., working longer, saving more, spending less, taking more or less risk with investments).

If you are near retirement or already retired, advice may be given on appropriate distribution strategies to minimize the likelihood of running out of money or having to adversely alter spending during your retirement years.

- **Risk Management:** A risk management review includes an analysis of your exposure to major risks that could have a significant adverse impact on your financial picture, such as premature death, disability, property and casualty losses, or the need for long-term care planning. Advice may be provided on ways to minimize such risks and about weighing the costs of purchasing insurance versus the benefits of doing so and, likewise, the potential cost of not purchasing insurance (“self-insuring”).
- **Tax Planning Strategies:** Advice may include ways to minimize current and future income taxes as a part of your overall financial planning picture. For example, we may make recommendations on which type of account(s) or specific investments should be owned based in part on their “tax efficiency,” with consideration that there is always a possibility of future changes to federal, state or local tax laws and rates that may impact your situation.

We recommend that you consult with a qualified tax professional before initiating any tax planning strategy, and we may provide you with contact information for accountants or attorneys who specialize in this area if you wish to hire someone for such purposes. We will participate in meetings or phone calls between you and your tax professional with your approval.

Employee Benefit Plan Services

CBP provides employee benefit plan services to employer plan sponsors on an ongoing basis. Generally, such services consist of assisting employer plan sponsors in establishing, monitoring and reviewing their company's participant-directed retirement plan. As the needs of the plan sponsor dictate, areas of advising could include: investment options, plan structure, and participant education.

In providing employee benefit plan services, CBP does not provide any advisory services with respect to the following types of assets: employer securities, real estate (excluding real estate funds and publicly traded REITS), participant loans, non-publicly traded securities or assets, other illiquid investments, or brokerage window programs (collectively, “Excluded Assets”).

Educational Seminars and Speaking Engagements

We may provide seminars on an “as announced” basis for groups seeking general advice on investments and other areas of personal finance. The content of these seminars will vary depending upon the needs of the attendees. These seminars are purely educational in nature and do not involve the sale of any investment products. Information presented will not be based on any individual person’s need, nor does CBP provide individualized investment advice to attendees during these seminars.

Client Tailored Services and Client Imposed Restrictions

We offer the same suite of services to all our Clients. However, specific Client financial plans and their implementation are dependent upon the Client Investment Policy Statement which outlines each Client’s current situation (income, tax levels, and risk tolerance levels) and is used to construct a Client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Wrap Fee Programs

We do not participate in wrap fee programs.

Item 5: Fees & Compensation

Please note, unless a Client has received the firm's disclosure brochure at least 48 hours prior to signing the investment advisory contract, the investment advisory contract may be terminated by the Client within 5 business days of signing the contract without incurring any advisory fees.

How CBP is paid depends on the type of advisory service CBP is performing. Please review the fee and compensation information below. The fee information shown below is as of the date of this Brochure. Legacy clients may have different fee schedules. In addition, CBP reserves the right to waive or discount fees at its discretion. The Client's actual fee will be as set forth in the advisory agreement between CBP and the Client.

Investment Management Services

Our standard advisory fee is based on the market value of the Assets Under Management (AUM) as of the end of the previous quarter, and is calculated as follows:

Total Assets Managed per Client Household	Annual Advisory Fee (divided quarterly by 4)
Less than or equal to \$1,000,000	1.30%
\$ 1,000,001 and above	0.95%

The advisory fee is calculated on the last day of the previous quarter as follows:

1. Determining the percentage rate, using the levels of assets shown in the above chart. The percentage rate applies to the full account value; it is not tiered.
2. Multiplying current assets under management by the corresponding percentage, and
3. Dividing by four.

The annual fees are negotiable and are pro-rated and paid in arrears on a quarterly basis.

Assets under management of a Client household are aggregated at the end of each quarter to determine the applicable percentage. Generally, a household includes the accounts of the Client and Client's spouse or partner, and minor children, or accounts in which any of these persons have a beneficial interest (e.g., business accounts, trusts).

Advisory fees are directly debited from Client accounts with Client permission. Accounts initiated or terminated during a calendar quarter will be charged a pro-rated fee based on the amount of time remaining in the billing period.

An account may be terminated with written notice at least 7 calendar days in advance. Since fees are paid in arrears, no rebate will be needed upon termination of the account.

Hourly Fee for Comprehensive Financial Planning Services

Financial planning services are provided separately from Investment Management Services. CBP charges an hourly fee of \$357 for financial planning services. The Client must pay the one-time, non-refundable engagement deposit of \$2,497, of which will be deducted from the total balance due upon completion of services. The hourly fee and engagement deposit may be negotiable in certain cases.

The hourly consulting fee applies to the hours worked in preparing the comprehensive financial plan, any financial analysis conducted, preparation of investment recommendation reports and analysis of Clients' investment accounts, and any other preparation of deliverables. The hourly rate also applies to any meetings conducted between Client and Adviser.

After the delivery of the initial comprehensive financial plan, Client will be invoiced for subsequent meetings, analysis, preparation of reports, and updates to their financial plan. Since fees are charged after services are delivered, no refund will be provided. In the event of early termination by Client, any fees for the hours already worked will be due. Client is required to pay the balance in full within 30 days of the invoice, unless otherwise a payment plan was agreed upon.

Fees for this service may be paid by electronic funds transfer via automated clearing house ("ACH"), credit card, debit card, or check.

Investment recommendations made by the Adviser, that are exclusive of Investment Management Services, and are incidental to Financial Planning Services, are to be implemented by the Client.

Employee Benefit Plan Services

Our standard advisory fee is 1.00% of the market value of the Assets Under Management (AUM) as of the end of the previous quarter.

CBP will be compensated for Employee Benefit Plan services according to the value of plan assets not to exceed 1.00% of total plan assets. This does not include fees to other parties, such as Record Keepers, Custodians, or Third Party-Administrators (TPAs). Fees for this service are either paid directly by the plan sponsor or deducted directly from the plan assets by the Custodian on a quarterly basis, and CBP's fee is remitted to us.

Alternate Fees

CBP may negotiate alternate fees. CBP may:

- Offer a flat fee based on a reduced hourly rate for a minimum number of hours.
- Negotiate a reduced hourly fee.
- Waive fees under special circumstances.
- Offer special promotional fees for services to both prospective and current clients.
- Offer employer-sponsored retirement plan education and advisory services for businesses for a negotiated fee.
- Offer pro-bono (free) services to individuals, nonprofit organizations, or family members of CBP, at the discretion of the advisor.

The Client and CBP will agree on the fee prior to any of the above activities. Since fees are paid after services are delivered, no refund will be necessary in the event of early termination.

Educational Seminars

Seminars are offered to organizations and the public on a variety of financial topics. Fees range from free to \$5,000 per seminar or free to \$250 per participant. Half of the fees are due prior to the engagement, and the other half are to be paid the day of, no later than the conclusion of the Seminar. The fee range is based on the content, amount of research conducted, number of hours of preparation needed, and the number of attendees.

In the event of inclement weather or a flight cancellation, the Speaker shall make all reasonable attempts to make alternative travel arrangements to arrive in time for the presentation. If travel proves impossible, or the event is otherwise canceled, the Speaker's fee is waived, but the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred.

In the event that the Client decides to cancel or change the date of the event for any reason besides weather or similar unforeseen causes, the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred and will provide payment for 30% of the Speaker's fee if the cancellation occurs within 30 days of the event.

In the event that the Speaker must cancel due to health or similar unforeseen circumstances, the Speaker will make all attempts to find a reasonable alternative engagement date and will absorb any incremental additional costs for obtaining alternative travel arrangements. If an alternative date cannot be obtained, the Client will not be responsible for any travel costs already incurred by the Speaker or any portion of the Speaker's fee.

Educational Seminars may be provided pro-bono at CBP's discretion.

Speaking Engagements

Helen Ngo is a public speaker. Generally, fees for her speaking engagements range from free to \$25,000 plus travel expenses, depending on sponsor, date, location, and program requested. For all speeches, 50% of the balance is due before the event and the remaining balance is due at the conclusion of the event.

Half of the fees are due prior to the engagement, and the other half are to be paid the day of, no later than the conclusion of the Seminar. The fee range is based on the content, amount of research conducted, number of hours of preparation

needed, and the number of attendees. The content is based on topics that are currently relevant in the financial planning environment.

In the event of inclement weather or a flight cancellation, the Speaker shall make all reasonable attempts to make alternative travel arrangements to arrive in time for the presentation. If travel proves impossible, or the event is otherwise canceled, the Speaker's fee is waived, but the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred.

In the event that the Client decides to cancel or change the date of the event for any reason besides weather or similar unforeseen causes, the Client will still be responsible for reimbursement of any non-refundable travel expenses already incurred and will provide payment for 30% of the Speaker's fee if the cancellation occurs within 30 days of the event.

In the event that the Speaker must cancel due to health or similar unforeseen circumstances, the Speaker will make all attempts to find a reasonable alternative engagement date and will absorb any incremental additional costs for obtaining alternative travel arrangements. If an alternative date cannot be obtained, the Client will not be responsible for any travel costs already incurred by the Speaker or any portion of the Speaker's fee.

Speaking Engagements may be provided pro-bono at CBP's discretion.

Other Types of Fees and Expenses

Fees paid to CBP are exclusive of brokerage commissions, transaction fees, and other related costs and expenses which may be incurred by the Client. Clients may incur certain charges imposed by custodians, brokers, and other third parties such as custodial fees, deferred sales charges, odd-lot differentials, transfer taxes, wire transfer and electronic fund fees, and other fees and taxes on brokerage accounts and securities transactions.

Fees paid to CBP are also separate and distinct from the internal fees and expenses charged by mutual funds, ETFs (exchange traded funds) or other investment pools to their shareholders (generally including a management fee and fund expenses, as described in each fund's prospectus or offering materials).

Mutual fund and ETFs (exchange traded funds) also charge internal management fees, which are disclosed in a fund's prospectus. Such charges, fees and commissions are exclusive of and in addition to our fee, and we shall not receive any portion of these commissions, fees, and costs.

Item 12 further describes the factors that CBP considers in selecting or recommending broker-dealers for Client's transactions and determining the reasonableness of their compensation (e.g., commissions).

CBP does not accept compensation for the sale of securities or other investment products including asset-based sales charges or service fees from the sale of mutual funds.

The Client should review all fees charged by funds, custodians, CBP and others to fully understand the total amount of direct and indirect fees incurred by the Client for investment and financial-related services.

NO SHOW POLICY:

A "no-show" is when a Client misses a scheduled appointment without notifying CBP within a reasonable time prior to the scheduled appointment time via phone or email. Client will be charged an hourly rate of \$357 for the allotted meeting time that was scheduled.

ENGAGEMENT DEPOSIT FOR FINANCIAL PLANNING SERVICES:

All financial planning services require a one-time, non-refundable engagement deposit. This engagement deposit is required prior to the start of any work conducted for financial planning deliverables and producing any financial planning and investment advisory services to the Client. Payment must be received by the Adviser within 14 calendar days of signing the Financial Planning Client Agreement (contract).

Item 6: Performance-Based Fees and Side-By-Side Management

CBP does not charge any performance-based fees (fees based on a share of capital gains on or capital appreciation of the assets of a Client). Such acceptance or management would pose a significant conflict of interest to Clients because

performance-based fees may provide an incentive to make investment decisions that pose excessive or inappropriate risk to the Client's financial situation. CBP considers avoidance of such conflict a paramount policy in maintaining our fiduciary duty to Clients.

Item 7: Types of Clients

CBP provides financial planning and investment management services to individuals, pension and profit-sharing plans, and business owners. Client relationships vary in scope and length of service.

There is no minimum account size requirement for investment management services.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

Before designing investment plans for Clients, CBP will evaluate the Client's current investments to determine whether the Client's goals harmonize with the Client's financial objectives. In designing investment plans for Clients, CBP relies upon the information supplied by the Client and Client's other professional advisors. Such information may pertain to the Client's financial situation, estate planning, tax planning, risk management, short-term and long-term lifetime financial goals and objectives, investment time horizon, and perceived current tolerance for risk. CBP will design and propose a portfolio to help the Client attain the Client's financial goals.

This information will become the basis for the strategic asset allocation plan which CBP believes will best meet the Client's stated personal financial goals. The strategic asset allocation provides for investments in those asset classes which CBP believes will possess attractive combinations of return, risk, and correlation over the long term.

When CBP invests Client assets, asset allocation techniques are used which include stocks and bonds of varying characteristics and from both the United States and foreign markets. CBP invests for the long term and expects that not all investments in a given portfolio will perform in unison with other assets in the same portfolio. CBP manages money for the Clients' downside protection, in addition to upside gain. CBP does not systematically re-balance the portfolio on a calendar basis but monitors each portfolio's asset allocation and will make adjustments where appropriate. CBP may also provide advice on any type of investment held in a Client's portfolio at the inception of the advisory relationship. CBP will explore other investment options at the Client's request. Additionally, CBP reserves the right to advise Clients on any other type of investment that it deems appropriate based on the Client's stated goals and objectives.

CBP utilizes a fundamental analysis approach. Fundamental analysis involves analyzing individual companies and their industry groups, such as a company's financial statements, details regarding the company's product line, the experience, and expertise of the company's management, and the outlook for the company's industry. The resulting data is used to measure the true value of the company's stock compared to the current market value. The risk of fundamental analysis is that information obtained may be incorrect and the analysis may not provide an accurate estimate of earnings, which may be the basis for a stock's value. If securities prices adjust rapidly to new information, utilizing fundamental analysis may not result in favorable performance.

Investment Strategies

Diversification across multiple asset classes is the primary characteristic of a well-designed portfolio. This objective is to capture the return behavior of an entire asset class. This approach is based upon the major tenets of Modern Portfolio Theory which states that markets are "efficient" and that an investor's returns are determined principally by asset allocation decisions, not market timing or selection of specific securities. CBP does not rely on economic forecasts, employ timing strategies which shift allocations between stocks, bonds and cash or search for "undiscovered" stocks. Asset classes with different risk/return profiles are combined together in an attempt to both lower the volatility of the overall portfolio and enhance returns.

Investment recommendations will be limited, in general, to institutional mutual funds, exchange traded funds, sub-advisor accounts with specific strategies, or direct fixed income obligations in the following categories:

- Cash and cash equivalents, including money market funds and bank certificates of deposit
- Bonds (Corporate, U.S. government, municipal, or foreign government)
- Stocks (U.S. and foreign-based companies) and Real Estate (REIT's)

- Alternative asset classes or investment strategies

Portfolio Review and Rebalancing

Market conditions cause the investment in various asset classes to vary from the initial allocation guidelines established for the Client. Each asset class in which the Client is invested will be reviewed periodically by CBP and rebalanced to a desired weighting when appropriate. When available, new cash flows will be deployed in a manner consistent with rebalancing the asset allocation. In the absence of cash flows, CBP will affect transactions to rebalance the portfolio. Income tax considerations are often reviewed where appropriate in determining rebalancing activity.

From time to time, based on changing economic or life circumstances or new academic research, it is desirable to make changes in asset allocation. Such changes should not, however, be made due to expectations of the relative short-term performance of individual asset classes.

Investment Strategy Performance

Asset class investment performance is cyclical and, therefore, may experience periods of time in which investment objectives are not met. In addition, unless there are extenuating circumstances, patience will often prove appropriate when performance has been disappointing for a particular asset class or the overall portfolio.

For the overall portfolio, the Client should allow a five-year time period or longer for achieving the stated investment return objectives. Shorter time frames contradict the principles of long-term investing. Under no circumstances, however, can results be guaranteed.

Material Risks Involved

All investing strategies we offer involve risk and may result in a loss of your original investment which you should be prepared to bear. Many of these risks apply equally to stocks, bonds, commodities and any other investment or security. Material risks associated with our investment strategies are listed below.

Market Risk: Market risk involves the possibility that an investment's current market value will fall because of a general market decline, reducing the value of the investment regardless of the operational success of the issuer's operations or its financial condition.

Strategy Risk: The Adviser's investment strategies and/or investment techniques may not work as intended.

Small and Medium Cap Company Risk: Securities of companies with small and medium market capitalizations are often more volatile and less liquid than investments in larger companies. Small and medium cap companies may face a greater risk of business failure, which could increase the volatility of the Client's portfolio.

Turnover Risk: At times, the strategy may have a portfolio turnover rate that is higher than other strategies. A high portfolio turnover would result in correspondingly greater brokerage commission expenses and may result in the distribution of additional capital gains for tax purposes. These factors may negatively affect the account's performance.

Limited Markets: Certain securities may be less liquid (harder to sell or buy) and their prices may at times be more volatile than at other times. Under certain market conditions we may be unable to sell or liquidate investments at prices we consider reasonable or favorable or find buyers at any price.

Concentration Risk: Certain investment strategies focus on particular asset-classes, industries, sectors or types of investment. From time to time these strategies may be subject to greater risks of adverse developments in such areas of focus than a strategy that is more broadly diversified across a wider variety of investments.

Interest Rate Risk: Bond (fixed income) prices generally fall when interest rates rise, and the value may fall below par value or the principal investment. The opposite is also generally true: bond prices generally rise when interest rates fall. In general, fixed income securities with longer maturities are more sensitive to these price changes. Most other investments are also sensitive to the level and direction of interest rates.

Legal or Legislative Risk: Legislative changes or Court rulings may impact the value of investments, or the securities' claim on the issuer's assets and finances.

Inflation: Inflation may erode the buying-power of your investment portfolio, even if the dollar value of your investments remains the same.

Geopolitical Risk: The risk of financial and market loss because of political decisions or disruptions in a particular country or region.

Catastrophic Events: In addition to general market risks, investments may be subject to the risk of loss arising from direct or indirect exposure to a number of types of catastrophic events, such as global pandemics, natural disasters, acts of terrorism, cyber-attacks, or network outages. The extent and impact of any such event on investment strategies will depend on many factors, including the duration and scope of the event, the extent of any governmental restrictions, the effect on the supply chain, overall consumer confidence, and the extent of the disruption to global and domestic markets.

Risks Associated with Securities

Apart from the general risks outlined above which apply to all types of investments, specific securities may have other risks.

Commercial Paper is, in most cases, an unsecured promissory note that is issued with a maturity of 270 days or less. Being unsecured the risk to the investor is that the issuer may default.

Common stocks may go up and down in price quite dramatically, and in the event of an issuer's bankruptcy or restructuring could lose all value. A slower-growth or recessionary economic environment could have an adverse effect on the price of all stocks.

Corporate Bonds are debt securities to borrow money. Generally, issuers pay investors periodic interest and repay the amount borrowed either periodically during the life of the security and/or at maturity. Alternatively, investors can purchase other debt securities, such as zero-coupon bonds, which do not pay current interest, but rather are priced at a discount from their face values and their values accrete over time to face value at maturity. The market prices of debt securities fluctuate depending on such factors as interest rates, credit quality, and maturity. In general, market prices of debt securities decline when interest rates rise and increase when interest rates fall. The longer the time to a bond's maturity, the greater its interest rate risk.

Bank Obligations including bonds and certificates of deposit may be vulnerable to setbacks or panics in the banking industry. Banks and other financial institutions are greatly affected by interest rates and may be adversely affected by downturns in the U.S. and foreign economies or changes in banking regulations.

Municipal Bonds are debt obligations generally issued to obtain funds for various public purposes, including the construction of public facilities. Municipal bonds pay a lower rate of return than most other types of bonds. However, because of a municipal bond's tax-favored status, investors should compare the relative after-tax return to the after-tax return of other bonds, depending on the investor's tax bracket. Investing in municipal bonds carries the same general risks as investing in bonds in general. Those risks include interest rate risk, reinvestment risk, inflation risk, market risk, call or redemption risk, credit risk, and liquidity and valuation risk.

Options and other derivatives carry many unique risks, including time-sensitivity, and can result in the complete loss of principal. While covered call writing does provide a partial hedge to the stock against which the call is written, the hedge is limited to the amount of cash flow received when writing the option. When selling covered calls, there is a risk the underlying position may be called away at a price lower than the current market price.

Exchange Traded Funds prices may vary significantly from the Net Asset Value due to market conditions. Certain Exchange Traded Funds may not track underlying benchmarks as expected.

Investment Companies Risk. When a Client invests in open end mutual funds or ETFs, the Client indirectly bears its proportionate share of any fees and expenses payable directly by those funds. Therefore, the Client will incur higher expenses, many of which may be duplicative. In addition, the Client's overall portfolio may be affected by losses of an underlying fund and the level of risk arising from the investment practices of an underlying fund (such as the use of derivatives). ETFs are also subject to the following risks: (i) an ETF's shares may trade at a market price that is above or below their net asset value; (ii) the ETF may employ an investment strategy that utilizes high leverage ratios; or (iii) trading of an ETF's shares may be halted if the listing exchange's officials deem such action appropriate, the shares are de-listed from the exchange, or the activation of market-wide "circuit breakers" (which are tied to large decreases in stock prices)

halts stock trading generally. The Adviser has no control over the risks taken by the underlying funds in which Client's invest.

Item 9: Disciplinary Information

Registered investment advisers are required to disclose all material facts regarding any legal or disciplinary events that would be material to your evaluation of Capital Benchmark Partners or the integrity of our management. CBP does not have any legal or disciplinary events reportable to this Item.

Item 10: Other Financial Industry Activities and Affiliations

Helen Ngo holds a life insurance license but does not actively engage in product sales with our Clients and does not actively pursue new life insurance business. Should she decide to actively engage in life insurance sales in the future, it will be disclosed to Clients and prospects and those changes will be disclosed in this brochure.

Item 11: Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

As a fiduciary, CBP and its associates have a duty of utmost good faith to act solely in the best interests of each Client. Our Clients entrust us with their funds and personal information, which in turn places a high standard on our conduct and integrity. Our fiduciary duty is a core aspect of our Code of Ethics and represents the expected basis of all of our dealings.

CBP also adheres to the Code of Ethics and Professional Responsibility adopted by the CFP® Board of Standards Inc. and accepts the obligation not only to comply with the mandates and requirements of all applicable laws and regulations but also to take responsibility to act in an ethical and professionally responsible manner in all professional services and activities.

This code does not attempt to identify all possible conflicts of interest, and literal compliance with each of its specific provisions will not shield associated persons from liability for personal trading or other conduct that violates a fiduciary duty to advisory Clients.

A summary of the Code of Ethics' Principles is outlined below.

- Integrity - Associated persons shall offer and provide professional services with integrity.
- Objectivity - Associated persons shall be objective in providing professional services to Clients.
- Competence - Associated persons shall provide services to Clients competently and maintain the necessary knowledge and skill to continue to do so in those areas in which they are engaged.
- Fairness - Associated persons shall perform professional services in a manner that is fair and reasonable to Clients, principals, partners, and employers, and shall disclose conflict(s) of interest in providing such services.
- Confidentiality - Associated persons shall not disclose confidential Client information without the specific consent of the Client unless in response to proper legal process, or as required by law.
- Professionalism - Associated persons' conduct in all matter shall reflect credit of the profession.
- Diligence - Associated persons shall act diligently in providing professional services.

CBP will, upon request, promptly provide a complete Code of Ethics.

Our firm and its "related persons" (associates, their immediate family members, etc.) may buy or sell securities the same as, similar to, or different from, those we recommend to Clients for their accounts. A recommendation made to one Client may be different in nature or in timing from a recommendation made to a different Client. Clients often have different objectives and risk tolerances. At no time, however, will our firm or any related party receive preferential treatment over our Clients.

In an effort to reduce or eliminate certain conflicts of interest involving the firm or personal trading, our policy may require that we restrict or prohibit associates' transactions in specific securities transactions. Any exceptions or trading pre-clearance must be approved by CBP's Chief Compliance Officer in advance of the transaction in an account, and we maintain the required personal securities transaction records per regulation.

Item 12: Brokerage Practices

Factors Used to Select Custodians and/or Broker-Dealers

CBP does not have any affiliation with Broker-Dealers. Specific custodian recommendations are made to Clients based on their need for such services. We recommend custodians based on the reputation and services provided by the firm.

Research and Other Soft-Dollar Benefits

We currently do not receive soft dollar benefits.

Brokerage for Client Referrals

We receive no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

Clients Directing Which Broker/Dealer/Custodian to Use

We do recommend a specific custodian for Clients to use; however, Clients may custody their assets at a custodian of their choice. Clients may also direct us to use a specific broker-dealer to execute transactions. By allowing Clients to choose a specific custodian, we may be unable to achieve most favorable execution of Client transaction and this may cost Clients money over using a lower-cost custodian.

Unless otherwise directed by clients, all transactions related to our discretionary investment management program will be implemented through either TD Ameritrade, Inc. ("TD Ameritrade"), or Charles Schwab & Co., Inc. ("Schwab"). TD Ameritrade and Schwab are each an unaffiliated broker-dealer, member FINRA/SIPC, and are referred to in this Brochure collectively as the "Custodian". The Custodian offers services which include custody of securities, trade execution, clearance and settlement of transactions. We participate in the institutional advisor program offered by the Custodian, We receive some benefits from the Custodian through our participation in the institutional advisor program, as more fully described in Item 14 below.

Aggregating (Block) Trading for Multiple Client Accounts

Generally, CBP combines multiple orders for shares of the same securities purchased for advisory accounts we manage (this practice is commonly referred to as "block trading"). We will then distribute a portion of the shares to participating accounts in a fair and equitable manner. The distribution of the shares purchased is typically proportionate to the size of the account, but it is not based on account performance or the amount or structure of management fees. Subject to our discretion, regarding particular circumstances and market conditions, when we combine orders, each participating account pays an average price per share for all transactions and pays a proportionate share of all transaction costs. Accounts owned by our firm or persons associated with our firm may participate in block trading with your accounts; however, they will not be given preferential treatment.

Item 13: Review of Accounts

For those Clients to whom CBP provides investment management services, account reviews will be conducted on an ongoing basis by CBP's Principals. All investment supervisory Clients are advised that it remains their responsibility to advise CBP in writing of any changes in the Client's investment objectives and/or financial situation, or if they wish to impose any reasonable restrictions on CBP's discretionary management services. All Clients (in person or electronically) are encouraged to review investment objectives and account performance with CBP on an annual basis. Additionally, CBP may conduct account reviews on an other-than periodic basis upon the occurrence of a triggering event such as a market correction, large deposits or withdrawals from an account, substantial changes in the value of a Client's portfolio, change in the Client's investment objectives and Client request.

Clients will receive trade confirmations from the broker(s) for each transaction in their accounts as well as monthly or quarterly statements and annual tax reporting statements from their custodian showing all activity in the accounts, such as receipt of dividends and interest.

CBP does not provide specific reports to Clients, other than financial plans.

Item 14: Client Referrals and Other Compensation

As disclosed in Item 12 above, with respect to our discretionary investment management program, we participate in the Custodian's institutional customer program. We may recommend the Custodian for custody and brokerage services. There is no direct link between our participation in the institutional customer service program and the investment advice we give to our clients, although we receive economic benefits that are typically not available to the Custodian retail investors. These benefits include the following products and services (provided without cost or at a discount): receipt of duplicate client statements and confirmations; research related products and tools; consulting services; access to a trading desk; access to block trading (which provides the ability to aggregate securities transactions for execution and then allocate the appropriate shares to client accounts); the ability to have advisory fees deducted directly from client accounts; access to an electronic communications network for client order entry and account information; access to mutual funds with no transaction fees and to certain institutional money managers; and discounts on compliance, marketing, research, technology, and practice management products or services provided to us by third party vendors.

The Custodian may have also paid for business consulting and professional services we received. Some of the products or services made available by the Custodian through the institutional customer program may benefit us but may not benefit our client accounts, including accounts not maintained at the Custodian. Other services made available by the Custodian are intended to help us manage and further develop our business enterprise. The benefits we receive through participation in the institutional customer program do not depend on the amount of brokerage transactions directed to the Custodian. As part of our fiduciary duty to clients, we endeavor at all times to put the interests of our clients first. You should be aware, however, that the receipt of economic benefits in and of itself creates a potential conflict of interest and may indirectly influence our choice of the Custodian for custody and brokerage services.

Other than as disclosed above, CBP does not receive any economic benefit, directly or indirectly from any third party for advice provided to our Clients. Nor do we directly or indirectly compensate any person who is not advisory personnel for Client referrals.

Item 15: Custody

CBP does not accept custody of Client funds; however, it is deemed to have custody of Client funds solely through the act of deducting advisory fees from Client accounts. Clients should receive at least quarterly statements from the broker dealer, bank or other qualified custodian that holds and maintains Client's investment assets. We urge you to carefully review such statements and compare such official custodial records to the account statements or reports that we may provide to you. Our statements or reports may vary from custodial statements based on accounting procedures, reporting dates, or valuation methodologies of certain securities.

For Client accounts in which CBP directly debits their advisory fee:

- CBP will send a copy of its invoice to the custodian.
- The custodian will send at least quarterly statements to the Client showing all disbursements for the account, including the amount of the advisory fee.
- The Client will provide written authorization to CBP, permitting CBP to be paid directly for their accounts held by the custodian.

Item 16: Investment Discretion

CBP typically receives discretionary authority from the Client at the beginning of an advisory relationship to select the identity and amount of securities to be bought or sold. Prior to CBP assuming discretionary authority over a Client's account, the Client shall be required to execute an Investment Advisory Agreement, granting CBP full authority to buy, sell, or otherwise effect investment transactions.

In addition, any investment discretion is obtained in writing through a limited power of attorney signed by the Client prior. In all cases, however, such discretion is to be exercised in a manner consistent with the stated investment objectives for the particular Client account.

Discretionary authority allows CBP to perform trades in the Client's account without further approval from the Client. This includes decisions on the following:

- Securities purchased or sold
- The amount of securities to be purchased or sold

Once the portfolio is constructed, CBP provides ongoing supervision and re-balancing of the portfolio as changes in market conditions and Client circumstances may require. CBP seeks to undertake a minimal amount of trading in Client accounts, in order to keep transaction fees, other expenses, and tax consequences associated with trading to minimal levels.

Clients who engage CBP on a discretionary basis may, at any time, impose restrictions, in writing, on CBP's discretionary authority (i.e. limit the types/amounts of particular securities purchased for their account, exclude the ability to purchase securities with an inverse relationship to the market, limit or proscribe CBP's use of margin, etc.).

Item 17: Voting Client Securities

CBP does not vote Client proxies. Therefore, Clients maintain exclusive responsibility for voting proxies, and acting on corporate actions pertaining to the Client's investment assets.

The Client shall instruct the Client's qualified custodian to forward to the Client copies of all proxies and shareholder communications relating to the Client's investment assets.

If the Client would like CBP's opinion on a particular proxy vote, they may contact us at the number listed on the cover of this brochure.

In most cases, you will receive proxy materials directly from the account custodian. However, in the event we were to receive any written or electronic proxy materials, we would forward them directly to you by mail, unless you have authorized our firm to contact you by electronic mail, in which case, we would forward you any electronic solicitation to vote proxies.

Item 18: Financial Information

In this item, registered investment advisers are required to provide you with certain financial information or disclosures about our financial condition. We have no financial commitment that impairs our ability to meet contractual and fiduciary commitments to Clients, and we have not been the subject of a bankruptcy proceeding.

We do not have custody of Client funds or securities or require or solicit prepayment of more than \$1,000 in fees per Client six months in advance.

Item 19: Requirements for State-Registered Advisers

Hao "Helen" Ngo is the principal owner of CBP. Information regarding her formal education, business background, and outside business activities is provided in Form ADV Part 2B (Brochure Supplement), attached to this document.

Neither CBP nor any associated person receives compensation for advisory services based on performance.

Neither CBP nor any associated person has any disciplinary events to disclose.

Neither CBP nor any associated person has any relationship or arrangement with any issuer of securities.

CAPITAL BENCHMARK PARTNERS

Form ADV Part 2B – Brochure Supplement for Hao “Helen” Ngo

Chief Executive Officer (CEO) and Chief Compliance Officer (CCO)

2342 Perimeter Park Drive, Suite 200, Atlanta, GA 30341
(770) 217-1202 Office & Fax

www.CapitalBenchmarkPartners.com

February 24, 2023

Item 1: Cover Page

This brochure supplement provides information about Hao (Helen) Ngo that supplements the Capital Benchmark Partners, LLC. (“CBP”) brochure. A copy of that brochure precedes this supplement, which you should have received a copy of.

Please contact Helen Ngo, Chief Compliance Officer, at (770) 217-1202 and/or hello@capitalbenchmarkpartners.com if you did not receive CBP’s brochure or if you have any questions about the contents of this supplement.

Additional information about Helen Ngo is available on the SEC’s website at www.adviserinfo.sec.gov, which can be found using Helen Ngo’s identification number (CRD #) 5544291.

Helen Ngo

Item 2: Educational Background and Business Experience

- Born: 1987

Educational Background

- 2009 – Bachelor of Arts, Economics and Mathematics, Emory University

Business Experience

- 01/2014 – Present, Capital Benchmark Partners, LLC, CEO and CCO
- 11/2011 – 02/2015, Raymond James Financial Services, Inc., Financial Advisor
- 11/2009 – 11/2011, Raymond James and Associates, Financial Advisor

Professional Designations, Licensing & Exams

CFP (Certified Financial Planner)®: The CERTIFIED FINANCIAL PLANNER™, CFP® and federally registered CFP (with flame design) marks (collectively, the “CFP® marks”) are professional certification marks granted in the United States by Certified Financial Planner Board of Standards, Inc. (“CFP Board”).

The CFP® certification is a voluntary certification; no federal or state law or regulation requires financial planners to hold CFP® certification. It is recognized in the United States and a number of other countries for its (1) high standard of professional education; (2) stringent code of conduct and standards of practice; and (3) ethical requirements that govern professional engagements with Clients. To attain the right to use the CFP® marks, an individual must satisfactorily fulfill the following requirements:

- **Education** – Complete an advanced college-level course of study addressing the financial planning subject areas that CFP Board’s studies have determined as necessary for the competent and professional delivery of financial planning services and attain a bachelor’s degree from a regionally accredited United States college or university (or its equivalent from a foreign university). CFP Board’s financial planning subject areas include insurance planning and risk management, employee benefits planning, investment planning, income tax planning, retirement planning, and estate planning;
- **Examination** – Pass the comprehensive CFP® Certification Examination. The examination includes case studies and Client scenarios designed to test one’s ability to correctly diagnose financial planning issues and apply one’s knowledge of financial planning to real-world circumstances;
- **Experience** – Complete at least three years of full-time financial planning-related experience (or the equivalent, measured as 2,000 hours per year); and
- **Ethics** – Agree to be bound by CFP Board’s *Code of Ethics and Standards of Conduct*, a set of documents outlining the ethical and practice standards for CFP® professionals.

Individuals who become certified must complete the following ongoing education and ethics requirements in order to maintain the right to continue to use the CFP® marks:

- **Continuing Education** – Complete 30 hours of continuing education hours every two years, including two hours on the *Code of Ethics and Standards of Conduct*, to maintain competence and keep up with developments in the financial planning field; and
- **Ethics** – Renew an agreement to be bound by the *Code of Ethics and Standards of Conduct*. The *Standards* prominently require that CFP® professionals provide financial planning services at a fiduciary standard of care. This means CFP® professionals must provide financial planning services in the best interests of their Clients.

CFP® professionals who fail to comply with the above standards and requirements may be subject to CFP Board’s enforcement process, which could result in suspension or permanent revocation of their CFP® certification.

Item 3: Disciplinary Information

No management person at Capital Benchmark Partners, LLC has ever been involved in an arbitration claim of any kind or been found liable in a civil, self-regulatory organization, or administrative proceeding.

Item 4: Other Business Activities

Helen Ngo is the owner and CEO of Made Modern Money, Inc. (“Made”), a company started September 3, 2017 in Georgia providing business and career coaching through educational courses online, one on one counseling, retreats and other live events.

Item 5: Additional Compensation

Helen Ngo does not receive any economic benefit from any person, company, or organization, in exchange for providing Clients advisory services through Capital Benchmark Partners.

Item 6: Supervision

Helen Ngo, as Chief Executive Officer and Chief Compliance Officer of Capital Benchmark Partners, LLC, is responsible for supervision. She may be contacted at the phone number on this brochure supplement.

Item 7: Requirements for State Registered Advisers

Helen Ngo has never been involved in an arbitration, civil proceeding, self-regulatory proceeding, administrative proceeding, or bankruptcy petition.